REMARKS

Claims 1, 3-16 and 18-28 are pending in this application. By this Amendment, claims 2 and 17 are canceled without prejudice to or disclaimer of the subject matter recited therein. Claims 1, 3, 4, 6 and 16 are amended. Claim 1 is amended to incorporate the subject matter of canceled claim 2, as well as to distinguish over the applied reference. Claim 16 is amended to incorporate the subject matter of claim 17, as well as to distinguish over the applied reference. Claims 3, 4 and 6 are amended to correct dependency. No new matter is added.

I.   Oath/Declaration

The Office Action alleges that the Oath/Declaration is missing from this case and request submission of the required document.

A fully executed Declaration and Power of Attorney was filed concurrently with this application on August 2, 2002. Although a Notice to File Missing Parts has not been received in this case, a courtesy copy of the Declaration filed on August 27, 2002 is enclosed.

II.   Claim Rejections under 35 U.S.C. §102

Claims 1-28 are rejected under 35 U.S.C. §102(e) as anticipated by U.S. Patent Publication 2003/0014445 to Formanek et al. As claim 2 is cancelled, the rejection of that claim is moot. The rejection of claims 1, 3-16 and 18-28 is respectfully traversed.

Formanek fails to disclose each and every feature recited in the rejected claims, as amended. For example, Formanek fails to disclose a method of converting a document in a page-image format into a form suitable for an arbitrarily sized display, comprising: deconstructing a document in a page image format; synthesizing the deconstructed document into an intermediate data structure; and distilling the intermediate data structure for redisplay in a format usable for an arbitrarily sized display, wherein deconstructing a document in a page image format includes: identifying text image areas and non-text image areas of the

document; locating and isolating text image areas and non-text image areas; processing the isolated text image areas and non-text image areas into text line regions and layout properties; processing located text line regions into segmented image elements; locating and labeling segmented image elements; and <u>compressing the segmented image elements into token-based image elements</u>, as recited in amended claim 1.

Formanek relates to a document reflowing technique used to transform document images into alternate document images that fit within a given display area and/or are scaled to various sizes. However, the methods disclosed in Formanek fail to disclose compressing the segmented image elements into token-based image elements. In contrast, the only discussion of compression in Formanek is that compression techniques may be use to reduce the amount of storage space. Accordingly, at least claims 1-13, 16 and 18-28 are not anticipated by Formanek. We note that the rejection of claims 16, 18-20 and 22-27 are rejected for the same reasons provided for rejecting claims 1, 3, 6, 7 and 10-15.
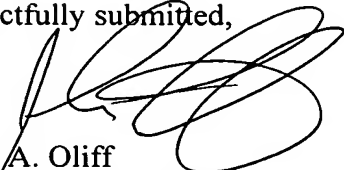
Regarding the rejection of claim 14 and 15, Formanek fails to disclose converting a sequence of page images into a sequence of document element images captured in <u>a tagged format</u> and re-converting the <u>tagged format</u> into at least one of electronic book format, an Internet browsable format that can accept images, and a print format. Formanek is silent regarding "tagging" of any kind. Thus, withdrawal of the rejections of claims 1, 3-16 and 18-28 under 35 U.S.C. §102(e) is respectfully requested.

III.   Conclusion

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1, 3-16 and 18-28 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,

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JAO:JWF/ldg

Attachment:
Declaration

Date: June 7, 2005

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